

## **RAMZY PAUL LADAH, ESO.**

Nevada Bar No. 11405

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## *Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

## **DISTRICT OF NEVADA**

PAMELA PIETRAFESO, an individual

2:22-cv-02010-RFB-NJK

**Plaintiff,**

VS.

SUNRISE SENIOR LIVING  
MANAGEMENT, INC. dba SUNRISE OF  
HENDERSON, a Foreign Corporation; DOE  
NURSES I - XX; DOE MEDICAL  
PROFESSIONALS I - XX; DOE  
TECHNICIANS I - XX; DOE STAFF I - XX;  
DOE HEALTH CARE PROVIDERS I - XX;  
and ROE BUSINESS ENTITIES I through  
XX, inclusive.

**STIPULATION AND ORDER TO  
CONTINUE DEADLINE TO FILE A  
RESPONSE TO DEFENDANT SUNRISE  
SENIOR LIVING MANAGEMENT,  
INC'S MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

### Defendants.

Plaintiff, by and through her counsel of record, Lada Law Firm, and Defendant, by and through its counsel of record, Moore & Lee LLP, hereby stipulate and agree to continue the time for Plaintiff to file a Response to Defendant Sunrise Senior Living Management, Inc's Motion to Dismiss, ECF No. 8, to January 5, 2023.

Plaintiff's Response is currently due on December 22, 2022. Plaintiff's counsel will be traveling out of the jurisdiction during the holiday season and cannot meet the current deadline without substantially altering his travel plans. After a meet and confer, Defendant's counsel graciously agreed to extend the briefing schedule on this matter. In sum, this stipulation is intended to permit counsel to complete the briefing on Defendant's Motion to Dismiss following the Christmas and New Year holidays. Thus, there is good cause for this stipulation.

1           The Parties further stipulate Defendant Sunrise Senior Living Management, Inc.'s Reply  
2 brief, if any, shall be due January 19, 2023.

3 DATED this 15<sup>th</sup> day of December, 2022.

DATED this 15<sup>th</sup> day of December 2022.

4 **LADAH LAW FIRM**

**MOORE & LEE, LLP**

5 /s/ *Ramzy P. Lada*

/s/ *Devon B. Moore*

6 **RAMZY P. LADAH, ESQ.**

**DEVON B. MOORE, ESQ.**

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10 Las Vegas, NV 89101

11 *Attorney for Plaintiff*

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**ORDER**

13           This matter having come before this Court upon the Stipulation of the parties hereto as set  
14 forth above, and with good cause, the Plaintiff will have until January 5, 2023, to file their  
15 Response to Defendant's Motion to Dismiss Plaintiff's Complaint, ECF No. 8. Defendant Sunrise  
16 Senior Living Management, Inc. shall file its Reply brief, if any, by January 19, 2023.

17           **IT IS SO ORDERED** this 20<sup>th</sup> day of December 2022.

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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

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